UNITED STATES DISTRICT COURT

DISTRICT OF RHODE ISLAND

George Guindon, et al.	:	
	:	
vs.	:	C.A. No. 03-335 L
	:	
American Foam, et al.	:	

STATE OF RHODE ISLAND
AND IRVING J. OWENS' MOTION TO EXCEED
PAGE LIMIT FOR THE FILING OF A MOTION TO DISMISS

Defendants State of Rhode Island and Irving J. Owens hereby Move this Honorable Court for an Order allowing them to exceed the twenty (20) page limit for memoranda with the filing of a Motion pursuant to F.R.C.P. 12(b)(6). For the reasons set forth in the Memorandum filed herewith, these defendants request that they be allowed to file a memoranda in support of their Motion not to exceed 35 pages.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on the 16th day of August, 2004, a copy of the within was mailed, via regular mail, postage prepaid, to the certification list.

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UNITED STATES DISTRICT COURT

DISTRICT OF RHODE ISLAND

George Guindon, et al.	:	
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MEMORANDUM IN SUPPORT OF STATE OF RHODE ISLAND AND IRVING J. OWENS' MOTION TO EXCEED PAGE LIMIT FOR THE FILING OF A MOTION TO DISMISS

Defendants State of Rhode Island and Irving J. Owens hereby Move this Honorable Court for an Order allowing them to exceed the twenty (20) page limit for memoranda with the filing of a Motion pursuant to F.R.C.P. 12(b)(6). For the reasons set forth in the Memorandum filed herewith, these defendants request that they be allowed to file a memoranda in support of their Motion not to exceed 35 pages.

Defendants State of Rhode Island and Irving J. Owens are currently named in six lawsuits related to The Station fire. These defendants anticipate filing a single (identical but for identifying references to the respective complaints) Memorandum to address all lawsuits and, therefore, the actual number of pages filed will be considerably less than that allowed by this Court's Order. Further, the Memorandum will deal with legal issues of great importance. It will address complaints that contain hundreds of allegations (and pages) and these defendants must address complex issues of sovereign immunity that other defendants will not have to research or address.

For these reasons, Defendants State of Rhode Island and Irving J. Owens respectfully request that they be allowed to file Memoranda not to exceed 35 pages in this case.

Respectfully submitted,

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